

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

John Doe,

Plaintiff,

v.

Clemson University, Clemson University
Board of Trustees, James P. Clements,
individually and as agent for Clemson
University, Alesia Smith, individually and as
agent for Clemson University, Suzanne
Price, individually and as agent for Clemson
University, Loreto Jackson, individually and
as agent for Clemson University, and David
Frock, individually and as agent for
Clemson University

Defendants.

CASE NO. 8:16-cv-01957-BHH

**PLAINTIFF JOHN DOE'S STATUS
REPORT REGARDING MOTION TO
COMPEL CHRYSTAL ANDERSON'S
RESPONSE TO SUBPOENA
DUCES TECUM**

On January 23, 2018, the Court issued an Order granting in part and denying in part Plaintiff's Motion to Compel Chrystal Anderson's Response to Subpoena Duces Tecum and Jane Doe's Motion to Quash John Doe's Subpoena to Chrystal Anderson. The Court directed Ms. Anderson to produce communications between herself and Jane Doe or Charles Doe that "do not relate to Jane Doe's therapy." The Court further ordered that, if such communications do not exist, Ms. Anderson was directed to "clearly inform the Court that she does not have these documents in a supplemental affidavit."

On January 25, 2018, counsel for John Doe notified Ms. Anderson of the Order via correspondence. On February 9, 2018, counsel for John Doe sent Ms. Anderson an e-mail to ensure that she had received a copy of the Order. On February 20, 2018, counsel for John Doe sent Ms. Anderson another e-mail regarding this issue because she had yet

responded to any of the previous correspondence or communications. On February 20, 2018, Ms. Anderson responded by providing an Affidavit, which is attached hereto as Exhibit A.

The Affidavit of Chrystal Anderson states that Ms. Anderson is not in possession of any communications between herself and Jane Doe or Charles Doe “that do not relate to Jane Doe’s therapy.”

CLAWSON FARGNOLI, LLC

s/ Christy R. Fagnoli

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Attorneys for Plaintiff

Charleston, South Carolina
February 23, 2018

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION
C/A No. 8:16-CV-01957-BHH**

John Doe,

Plaintiff,

vs.

Clemson University, Clemson University
Board of Trustees, James P. Clements,
individually and as agent for Clemson
University, Almeda Jacks, individually and as
agent of Clemson University, Alesia Smith,
individually and as agent of Clemson
University, Suzanne Price, individually and as
agent of Clemson University, Loreto Jackson,
individually and as agent of Clemson
University, David Frock, individually and as
agent of Clemson University,

Defendants.

**SUPPLEMENTAL AFFIDAVIT OF
CHRYSTAL ANDERSON**

PERSONALLY APPEARED BEFORE ME, the undersigned, who after being duly sworn, deposes and says:

1. My name is Chrystal Anderson. I am over the age of eighteen (18) years and provide this Affidavit of my own personal knowledge.
2. I received a copy of the Court's Order dated January 23, 2018 and filed as Entry Number 71 in this lawsuit.
3. I am not in possession of any communications between myself and Jane Doe or Charles Doe, individually or together, whether made during my employment with Clemson University or after my employment ended, that do not relate to Jane Doe's therapy. The pseudonyms "Jane Doe" and "Charles Doe" refer to the male and female, respectively, identified in the May 2017 subpoena, which is filed as Entry Number 51-1 in this lawsuit.

[Signature Page to Follow]

Chrystal Anderson, LPC
Chrystal Anderson, LPC

SWORN to and subscribed before me
this 9 day of February, 2018

Sandra G. Gentry (L.S.)

Notary Public for South Carolina

My Commission Expires: 2/7/2023

